

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

L.G. PHILLIPS LCD CO., LTD.,

Plaintiff,

TATUNG COMPANY; TATUNG  
COMPANY OF AMERICA, INC.; AND  
VIEWSONIC CORPORATION,

Defendants

Civil Action No. 04-343-JJF

**DECLARATION OF VALERIE W. HO**

I, Valerie W. Ho, declare:

1. I am a shareholder of Greenberg Traurig, LLP, one of the law firms representing Tatung Company and Tatung Company of America. I have been admitted *pro hac vice* in connection with this case. I have personal knowledge of the matters set forth below, and if called as a witness, could and would competently testify regarding these matters. I make this Declaration in support of the Tatung Defendants' Objections to the Special Master's Report and Recommendation Regarding (a) LG. Philips LCD Co., Ltd.'s ("LPL") Motion to Compel Tatung Defendants to Provide Discovery on Advice of Counsel and Duty of Care; and (b) the Tatung Defendants' Cross-Motion to Bifurcate Discovery, issued on May 8, 2007.

2. Attached as Exhibit A is a true and correct copy of LPL's letter brief in connection with its Motion to Compel Discovery Regarding Advice of Counsel, filed on December 22, 2006.

3. Attached as Exhibit B is a true and correct copy of the Tatung Defendants' Opposition to LPL's Motion to Compel Discovery Regarding Advice of Counsel, filed on January 8, 2007.

4. Attached as Exhibit C is a true and correct copy of LPL's letter brief to the Special Master, filed on January 11, 2007.

5. Attached as Exhibit D is a true and correct copy of the Tatung Defendants' Supplemental Brief Regarding Advice of Counsel, filed on January 26, 2007.

6. Attached as Exhibit E is a true and correct copy of LPL's Supplemental Brief Regarding Advice of Counsel, filed on January 31, 2007.

7. Attached as Exhibit F is a true and correct copy of the Special Master's Report and Recommendation Regarding (a) LG. Philips' Motion to Compel Tatung Defendants to Provide Discovery on Advice of Counsel and Duty of Care; and (b) the Tatung Defendants' Cross-Motion to Bifurcate Discovery, issued on May 8, 2007.

8. Attached as Exhibit G is a true and correct copy of LPL's Sixth Supplemental Objections and Answers to Defendant Tatung Company's First Set of Interrogatories, dated April 6, 2007.

9. Attached as Exhibit H is a true and correct copy of LPL's Seventh Supplemental Objections and Answers to Defendant Tatung Company's First Set of Interrogatories, dated May 4, 2007.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true.

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Executed this 29th day of May 2007 in Santa Monica, California.

A handwritten signature in black ink, consisting of a large, stylized 'V' followed by a horizontal line and a loop, positioned above a solid horizontal line.

Valerie W. Ho

**UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE**

**CERTIFICATE OF SERVICE**

I hereby certify that on May 29, 2007 I caused to be served by electronic mail and hand delivery the foregoing document and electronically filed the same with the Clerk of Court using CM/ECF which will send notification of such filing(s) to the following:

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I hereby certify that on May 29, 2007 I caused to be sent the foregoing document by electronic mail and Federal Express to the following non-registered participants:

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